

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
§
VS. § 4:12-cr-503
§ (Hon. Lee H. Rosenthal)
JASON DANIEL GANDY §

**UNOPPOSED MOTION TO EXTEND TIME FOR
FILING DEFENDANT'S RULE 29 MOTION**

COMES NOW JASON GANDY, Defendant, through counsel Sean Buckley, and files this Motion to Extend Time for Filing Defendant's Rule 29 Motion, for cause showing the Honorable Court as follows:

1. Defendant's final Rule 29 Motion was due on August 6, 2018; but as a result of "excusable neglect," no motion or extension request was timely filed.

Defendant was convicted by a jury on July 23, 2018. Defendant's final Rule 29 motion was due yesterday, on August 6, 2018. However, Defendant did not timely file the Motion or an extension request by the due date because undersigned counsel mistakenly entered the deadline in the wrong month of his paper calendar—and missed it. This oversight was neither caused nor desired by Defendant. Therefore, Defendant moves for a post-deadline extension of time under the authority of Rule 6 (b)(1)(B).

2. Defendant respectfully requests a 15-day extension of the deadline to file his final Rule 29 motion.

Defendant's trial concluded with guilty verdicts on all counts on July 23, 2018. Defendant respectfully requests an extension of the time to file his final Rule 29 motion until Tuesday, August 21, 2018.

3. Relief requested.

Defendant Jason Gandy respectfully requests that the Honorable Court grant a post-deadline extension of time under Rule 6(b)(1)(B) for “excusable neglect.” Furthermore, Defendant respectfully requests a 15-day extension of the time to file his final Rule 29 motion until Tuesday, August 21, 2018.

Respectfully submitted,

/s/ Sean Buckley
Sean Buckley
State Bar No. 24006675
770 South Post Oak Lane, Ste. 620
Houston, Texas 77056
TEL: 713-380-1220
FAX: 713-552-0746
Email: buckleyfirm@gmail.com

Certificate of Conference

I certify that I discussed this Motion to Extend Time for Filing Defendant’s Rule 29 Motion with Assistant United States Attorney Sherri Zack on this the 7th day of August, 2018, and she indicated that the Government is UNOPPOSED.

/s/ Sean Buckley
Sean Buckley

Certificate of Service

I certify that I provided a copy of this Motion to Extend Time for Filing Defendant's Rule 29 Motion to Assistant United States Attorney Sherri Zack and all parties via the ECF system on this the 7th day of August, 2018.

/s/ Sean Buckley

Sean Buckley